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January 26, 2017

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Cable Special Relief Petitions; MB Docket No. 15-71

Dear Ms. Dortch:

Consistent with the Market Modification docket referenced above, attached are results for a preliminary evaluation of a potential market modification for stations KFXK, KLTV, KYTX, and KETK in Harrison County, TX.

If you have any questions, feel free to contact me at (202) 457-3058.

Sincerely,

/s/ Christopher M. Heimann



January 25, 2017

Via FedEx

Hugh Taylor
Harrison County Judge
#1 Peter Whetstone Square, Room 314
Marshall, TX 75670

Dear Judge Taylor:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **Harrison County, TX**.

DIRECTV's engineering staff was given the areas to evaluate for stations **KFXK, KLTV, KYTX, and KETK** on our **Tyler-Longview, TX** spot beams, and have found that:

- DIRECTV's SD spot beam covers **all** current zip codes in **Harrison County**
- DIRECTV's HD spot beam covers **all** current zip codes in **Harrison County**

Please see attached for specific spot beam zip code coverage information. DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KFXK	TX	HARRISON

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to- interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

- ☒ HD ☒ SD Can provide service to all the zip codes associated with this request.*
- ☐ HD ☐ SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐ HD ☐ SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/19/17
Date

Signature

Thursday, December 15, 2016

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KLTV	TX	HARRISON

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to- interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

- ☒ HD ☒ SD Can provide service to all the zip codes associated with this request.*
- ☐ HD ☐ SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐ HD ☐ SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

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Station	State	County
KYTX	TX	HARRISON

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to-interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

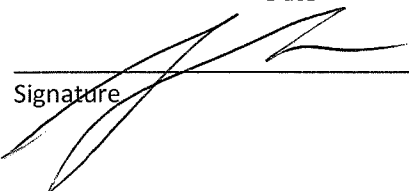
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2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KETK	TX	HARRISON

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
- The measured performance of the spot beam covering this Television Station's local market.
 - Estimated atmospheric effects for reception of the signal.
 - Estimated levels of interference.
 - The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
- Signal availability.
 - Clear sky signal margin.
 - Total carrier-to-interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
- ☒ HD ☒ SD Can provide service to all the zip codes associated with this request.*
- ☐ HD ☐ SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐ HD ☐ SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

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